

## **EXHIBIT C**

**From:** [Garnett, Stanley](#)  
**To:** [Papez, Elizabeth P.](#)  
**Cc:** [Trusty, James](#); [George Calhoun](#); [jhamlin@ifrahlaw.com](#); [gbrower@bhfs.com](#); [Stokes, Patrick F.](#); [Barrett, Claudia M.](#); [Andrews, Travis](#); [MacDonald, Lora Elizabeth](#)  
**Subject:** Re: Sealed Preliminary Injunction 1:20cv484  
**Date:** Wednesday, June 10, 2020 2:37:36 PM

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[External Email]

Elizabeth,

We do not object to filing the unsealing notice, nor to the redactions. We have no redactions or confidential designations of our own. Thanks for submitting this. It will make the mechanics of processing easier for everyone.

Regarding bond, Brian has continued to work with the bonding agents at IMA. They informed him that any bond must be 100% secured and they are evaluating his assets to determine what might be sufficient. They anticipate letting him know what is possible by tomorrow at which time I will promptly inform you.

Thanks,

Stanley L. Garnett  
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410 Seventeenth Street, Suite 2200  
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[Sgarnett@bhfs.com](mailto:Sgarnett@bhfs.com)

On Jun 10, 2020, at 6:26 AM, Papez, Elizabeth P. <EPapez@gibsondunn.com> wrote:

Stan – in connection with the unsealing notice Plaintiffs are designating confidential and filing redacted versions of the following for the public docket: Exhibits 3, 14, 28, 32, 33, and 37 to the 4/27/20 MacDonald Declaration and the 5/18 Doden Declaration. Please let us know if you have a position on the designations, or if there are defense documents you plan to identify for additional redactions.

Thanks,

**Elizabeth P. Papez**

**GIBSON DUNN**

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**From:** Papez, Elizabeth P. <[EPapez@gibsondunn.com](mailto:EPapez@gibsondunn.com)>  
**Sent:** Monday, June 8, 2020 5:11 PM  
**To:** Garnett, Stanley <[SGarnett@bhfs.com](mailto:SGarnett@bhfs.com)>  
**Cc:** Trusty James <[jtrusty@ifrahlaw.com](mailto:jtrusty@ifrahlaw.com)>; George Calhoun <[george@ifrahlaw.com](mailto:george@ifrahlaw.com)>;  
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<[LMacDonald@gibsondunn.com](mailto:LMacDonald@gibsondunn.com)>  
**Subject:** RE: Sealed Preliminary Injunction 1:20cv484

Stan – as noted we'll proceed this week with a motion to unseal the docket. If the insurance disclosure you mentioned is time sensitive please let us know and we can try to expedite the filing to accommodate. Please also let us know the status on the bond. Thanks and regards,

**Elizabeth P. Papez**

## GIBSON DUNN

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**From:** Garnett, Stanley <[SGarnett@bhfs.com](mailto:SGarnett@bhfs.com)>  
**Sent:** Friday, June 5, 2020 6:16 PM  
**To:** Papez, Elizabeth P. <[EPapez@gibsondunn.com](mailto:EPapez@gibsondunn.com)>  
**Cc:** Trusty James <[jtrusty@ifrahlaw.com](mailto:jtrusty@ifrahlaw.com)>; George Calhoun <[george@ifrahlaw.com](mailto:george@ifrahlaw.com)>;  
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<[LMacDonald@gibsondunn.com](mailto:LMacDonald@gibsondunn.com)>  
**Subject:** Re: Sealed Preliminary Injunction 1:20cv484

[External Email]

Thanks, Elizabeth. Have a nice weekend.

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On Jun 5, 2020, at 3:55 PM, Papez, Elizabeth P.  
<[EPapez@gibsondunn.com](mailto:EPapez@gibsondunn.com)> wrote:

Counsel – attached per the Court’s correspondence below is the Preliminary Injunction Order entered this evening. We will also serve the order on all other parties per the Court’s request.

Stan – if you have not yet prepared a motion to modify the seal order for the insurance disclosure you requested yesterday, we are happy to coordinate Monday on that and other unsealing issues.

Thanks and regards,

**Elizabeth P. Papez**

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**From:** Diane Wood <[Diane\\_Wood@vaed.uscourts.gov](mailto:Diane_Wood@vaed.uscourts.gov)>

**Sent:** Friday, June 5, 2020 5:39 PM

**To:** Papez, Elizabeth P. <[EPapez@gibsondunn.com](mailto:EPapez@gibsondunn.com)>

**Subject:** [WARNING: ATTACHMENT UNSCANNED: AMP Service Not Available]Sealed Preliminary Injunction 1:20cv484

**Importance:** High

[External Email]

Elizabeth:

Pursuant to our telephone conversation, upon your receipt of this order I would appreciate your distributing a copy to all counsel of record.

If you have any questions, please let me know.

Thank you – stay safe.

Diane B. Wood  
Chambers of The Honorable Liam O’Grady  
United States District Court  
Eastern District of Virginia  
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